

Ashley A. Marton, OSB 171584
ashley@employmentlaw-nw.com
Craig A. Crispin, OSB No. 82485
crispin@employmentlaw-nw.com
CRISPIN EMPLOYMENT LAW PC
1834 SW 58th Avenue, Suite 200
Portland, Oregon 97221
Telephone: 503-293-5770
Fax: 503-293-5766
Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

AMBER HICKS,

Civil No. 3:20-cv-01344-MO

Plaintiff,

v.

NATIONSTAR MORTGAGE LLC, a
foreign business limited liability company,
formerly known as **SERTERUS, INC.**, a
subsidiary of **INTERNATIONAL**
BUSINESS MACHINES CORPORATION,
a foreign business corporation,

**FIRST JOINT MOTION TO EXTEND
DISCOVERY AND PRETRIAL
DEADLINES**

Defendants.

MOTION

Pursuant to Local Rules 16-3 and 7-3, Plaintiff Amber Hicks and Defendant Nationstar Mortgage LLC, *etc.*, respectfully request, for good cause shown, that the Court extend the Notice of Case Assignment and Discovery and Pretrial Scheduling Order [Dkt No. 2] to allow the parties time to negotiate a resolution to the matter. The parties move the Court for an order

extending the current discovery and pretrial deadlines by 60 days as follows:

| CURRENT | | PROPOSED |
|-----------------------------------|------------------|------------------|
| Fact Discovery Completed | December 8, 2020 | February 8, 2021 |
| Joint ADR Report & Pretrial Order | January 7, 2020 | March 8, 2021 |

The reason for this Motion is to allow the parties additional time to negotiate a resolution. This Motion is made for good cause and not for the purposes of delay. This is the first requested extension of deadlines.

DATED: December 29, 2020

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**OLGLETREE, DEAKINS, NASH, SMOAK &
STEWART, PC**

By: /Ashley A. Marton
Ashley A. Marton, OSB No. 171584
Of Attorneys for Plaintiff

By: s/Elizabeth A. Falcone (signature authorized)
Elizabeth A. Falcone, OSB No. 111694
Of Attorneys for Defendants